

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

REGULATORY CONTACT RECORD

Date/Time: Wednesday, August 29, 2001 10:30 a.m.

Site Contact(s): Ted A. Hopkins
Phone: 303-966-7652

Regulatory Contact: James Hindman
Phone: 303-692-3345

Agency: CDPHE

Purpose of Contact: Approval to move Gloveboxes (GB) from B707 to B776/777 and manage as remediation waste under RFCA.

Discussion

On July 26, 2001, Carolyn Hicks called to discuss the applicability of expanding the universe of remediation waste to include Gloveboxes taken out-of-service prior to approval of the facility's DOP. Subsequent phone calls with Mr. Hindman culminated in approval of the following:

1. Classification of all Gloveboxes in B707 and B776 as remediation waste regardless of when this equipment was taken out-of-service;
2. Permission to transfer remediation waste from B707 to B776 for size reduction and packaging in the ITDC; and
3. Documentation of the classification of these GB as remediation waste will be placed in the Operating Record for each facility and in the Travelers for each GB subject to this Contact Record.

BACKGROUND

Gloveboxes taken out-of-service prior to the signing of the DOP for B707 and B776 are identical to equipment being managed as remediation waste under the facilities' DOPs. These Gloveboxes were either generated in B707/B776 or were shipped from other on-site facilities to these buildings for size reduction. To prevent the spread of radioactive contamination, these Gloveboxes were wrapped in plastic, and/or packaged in crates, and placed in storage waiting on final disposition during D&D of the building. It is anticipated that the majority of these GB will be disposed of at the Nevada Test Site (NTS).

Before these GBs can be shipped off-site for disposal at NTS, they must be size reduced and RCRA constituents such as lead shielding removed. B707 does not have a unit

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B707-A-000058

CEX-105-01

capable of size reducing/packing this waste stream. To manage these wastes in B707, either a temporary unit would have to be constructed around each GB/crate or a single permanent structure would need to be built. B776 is in the process of building a permanent unit (the ITDC) capable of handling this type of waste. The ITDC was designed to handle large equipment/GB. Operations for which this system was designed include stripping off RCRA constituents (lead shielding, windows, lead gloves, etc.), size reducing and repackaging to meet WIPP and/or NTS WAC. The ITDC will be operational at the end of September and is authorized to manage remediation waste.

OPERATING RECORD

The following actions will be taken to document this decision:

- A copy of this Contact Record will be placed in the Administrative Record for Buildings 707 and 776/777;
- A copy of this Contact Record will be placed into each GB Traveler that is subject to this decision; and
- In the comment section of these Travelers, a brief description of this decision will be added (e.g., This GB will be managed as remediation waste per Contact Record issued 8/29/2001 and shipped to B776 ITDC for size reduction.)

Contact Record Prepared by: Ted A. Hopkins

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